



17/037/038

United States Department of the Interior

BUREAU OF LAND MANAGEMENT

Moab District
San Juan Resource Area
P.O. Box 7
Monticello, Utah 84535

SJ-93-02
(U-069)

Mr. Holland Shepherd
Senior Reclamation Specialist
State of Utah Division of Oil, Gas & Mining
355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203

RECEIVED

JUL 20 1993

DIVISION OF
OIL GAS & MINING

Dear Mr. Shepherd:

An inspection of the reclamation work at the Repete and Lee Mines was done on July 16, 1993. The inspection was done by Ted McDougall of this office and Mr. Jerry Richards, Production Superintendent for Energy Fuels Nuclear Inc (EFNI). After visiting the mine sites and reviewing the status plats, it has been determined that the majority of the affected lands are outside the jurisdiction of the Bureau of Land Management. Portal areas No. 1 and No. 3 at the Repete Mine are on the Navajo Indian Reservation. Portal area No. 2 and access to the portal/pad are on federal lands administered by the BLM. The majority of the Lee Mine is split estate with the surface being in private ownership and the minerals being reserved to the federal government. Only a small portion of the disturbance at the southern extreme of the Lee Mine area is BLM administered land.

Overall, we feel that the reclamation work at the mine sites is well done. Energy Fuels has put a lot of effort into reshaping the mine dumps and closing the old portals and access roads. We do have some concern about the timing of the seed application. Generally we prefer to seed later in autumn to take advantage of increased precipitation and cooler temperatures, although it is possible that the seeds could remain viable until this fall.

A 15-20 feet vertical cut bank (highwall) exists at the Lee Mine site. The highwall is located on private surface. The highwall is very obvious from the county road and will remain so after the surrounding area has recovered. In consideration of our administrative constraints on split estate lands, we are recommending that the highwall be reduced to approximate the adjacent reclaimed slope. However, this recommendation is conditional on the equipment still being available at the site.

Subsequent to our inspection, you indicated in telephone conversation that the Division intends a partial bond release on the site for the work determined to be acceptable, and that adequate bonding would be retained as a contingency for seeding. We are in agreement with partial release of EFNI's bond and since the majority of the site is outside the public domain, we will accept the Divisions judgement on the bond amount to retain. Please keep us informed of your decisions and any developments in the case that may affect public land. We also request that you notify us prior to final release of the site and allow us the opportunity for a close-out inspection of the site.

If you have questions, please contact Ted McDougall of my staff at (801) 259-2141.

Sincerely,

A handwritten signature in black ink, reading "Sherwin N. Sandberg". The signature is written in a cursive, flowing style.

Area Manager